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7 Attorneys for Defendants
7 HARVEST KING TRADING USA, LIMITED,
8 THOMAS JAU and PAK LAM

9
10 **UNITED STATES DISTRICT COURT**
11
12 **CENTRAL DISTRICT OF CALIFORNIA**

12 COASTAL CORPORATION LTD.

13 Plaintiff,

14 v.

15 HARVEST KING TRADING USA,
16 LIMITED, a California corporation,
16 THOMAS JAU, an individual aka TOM
17 JAU; LAM, an individual; PAK LAM,
17 an individual; DOES 1 through 10,
18 inclusive,

18 Defendants.

12 Case No. 2:22-CV-02687-DEF-JEM

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14 **DECLARATION OF ALBERTO J.**
15 **CAMPAIN RE COMPLIANCE**
16 **WITH ORDER CONDITIONALLY**
16 **GRANTING MOTION TO**
17 **WITHDRAW AS COUNSEL OF**
17 **RECORD (DKT. 24)**

18 Date: February 27, 2023

19 Time: 1:30 p.m.

20 Ctrm: 7D

21 Complaint filed: April 22, 2022

22 Trial Date: June 20, 2023



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DECLARATION OF ALBERTO J. CAMPAIN

I, Alberto J. Campain, hereby declare:

1. I am an attorney at law, duly licensed to practice before all the courts of the State of California. I am a partner at Ecoff Campain Tilles & Kay, LLP, counsel of record for defendants Harvest King Trading USA, Limited, Thomas Jau and Pak Lam (collectively “Defendants”). I have personal knowledge of the facts stated in this declaration and, if called as a witness, could and would testify competently to those facts.

2. I submit this declaration in compliance with the Order Conditionally Granting Motion to Withdraw As Counsel of Record (Dkt. 24) brought by Lawrence C. Ecoff, Esq., Alberto J. Campain, Esq., and the law firm of Ecoff Campain Tilles & Kay, LLP (collectively “Ecoff Firm”). Attached hereto as Exhibit “A” is true and correct copy of the Order.

3. The current addresses and phone numbers for Thomas Jau, Pak Lam and Harvest King Trading USA, Limited, verified as accurate on February 22, 2023 via a telephone call with Thomas Jau, are 725 W. Duarte Road, #1581, Arcadia, CA 91007, (626) 893-3699.

4. This declaration hereby informs Thomas Jau, Pak Lam and Harvest King Trading USA, Limited and all attorneys of record that the stated addresses will be the address to which all future documents will be served or sent until changed by appropriate notice or substitution of attorney;

5. This declaration hereby informs Thomas Jau, Pak Lam and Harvest King Trading USA, Limited of all future dates now set in this action, including, but not limited to, pre-trial conference related dates, discovery cut-off dates, the motion cut-off date, and dates relating to any pending discovery obligations

Last day for hearing motions (except motions to amend pleadings or add parties, LR 7 (Monday)	March 13, 2023
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1	Last day to conduct ADR Proceeding, LR 16-15	March 27, 2023
2	Trial Documents (Set One) All Trials: File Memo of Contentions of Fact and Law, LR 16-4; Exhibit & Witness Lists, LR 16-5, 6; Status Report Regarding Settlement; Motions in Limine (no more than five motions per side may be filed with Court permission) Court Trial Only: Lodge Findings of Fact and Conclusions of Law; LR 52; File Summaries of Direct Testimony (optional)	April 24, 2023
3	Trial Documents (Set Two) All Trials: Lodge Pretrial Conference Order, LR 16-7; File Oppositions to Motions in Limine Jury Trial Only: File Agreed Set of Jury Instructions and Verdict Forms; File Statement Regarding Disputed Instructions and Verdict Forms	May 1, 2023
4	Pretrial Conference, LR 16; Hearings on Motions in Limine (Monday)	May 15, 2023 3:00 p.m.
5	Trial (jury) (Duration Estimate: 3 days) (Tuesday)	June 20, 2023 8:30 a.m.

6. This declaration hereby informs Pak Lam and Thomas Jau that any individual appearing pro se will be required to comply with this Court's standing orders, this District's Local Rules, the Federal Rules of Civil Procedure and all other Federal Rules

7. This declaration hereby informs Harvest King Trading USA, Limited that it cannot appear without counsel, and of the consequences of its failure timely to obtain counsel. See Local Rule 83-2.2.2.

8. This declaration hereby informs Thomas Jau, Pak Lam and Harvest King Trading USA, Limited that their case file may be picked up from Ecoff

1 Campain Tilles & Kay, LLP, 280 S. Beverly Drive, Suite 504, Beverly Hills, CA
2 90212.

3 9. This declaration hereby informs Thomas Jau, Pak Lam and Harvest
4 King Trading USA, Limited that:

5 Although the individual clients are proceeding pro se, i.e., without legal
6 representation, they nonetheless are required to comply with Court orders, the Local
7 Rules, and the Federal Rules of Civil Procedure. See C.D. Cal. L.R. 83-2.2.3. The
8 Local Rules are available on the Court's website,
9 <http://www.cacd.uscourts.gov/court-procedures/local-rules>.

10 The Court cannot provide legal advice to any party, including pro se litigants,
11 i.e., parties who are not represented by a lawyer. There is a free "Pro Se Clinic" that
12 can provide information and guidance about many aspects of civil litigation in this
13 Court.

14 Parties in court without a lawyer are called "pro se litigants." These parties
15 often face special challenges in federal court. Public Counsel runs a free Federal
16 Pro Se Clinic where pro se litigants can get information and guidance. The Clinic is
17 located at the Roybal Federal Building and Courthouse, 255 East Temple Street, Los
18 Angeles, CA 90012 (note that the clinic may not be open for in-person appointments
19 during the pandemic). Pro se litigants must call or submit an on-line application to
20 request services as follows: on-line applications can be submitted at
21 <http://prose.cacd.uscourts.gov/los-angeles>, or call (213) 385-2977, ext. 270.

22 Individual pro se litigants may submit documents for filing through the
23 Court's Electronic Document Submission System (EDSS) instead of mailing or
24 bringing documents to the Clerk's Office. Only internet access and an e-mail
25 address are required. Documents are submitted in PDF format through an online
26 portal on the Court's website. To access EDSS and for additional information, visit
27 the Court's website at <https://apps.cacd.uscourts.gov/edss>.

28 Attorneys may not use EDSS to submit documents on behalf of their clients.



1 Attorneys are required by the local rules to file documents electronically using the
2 Court's CM/ECF System

3 10. This declaration hereby informs Harvest King Trading USA, Limited
4 that failure of the client to appear through counsel no later than March 27, 2023 will
5 result in the striking of the entity's answer and entry of its default.

6 11. Proof of Service this Declaration and Order Conditionally Granting
7 Motion to Withdraw As Counsel of Record (Dkt. 24)

8 I declare under penalty of perjury under the laws of the State of California
9 that the foregoing is true and correct.

10 Executed on February 22, 2023, at Beverly Hills, California.

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12 */s/ Alberto J. Campain*
13 ALBERTO J. CAMPAIN, ESQ.
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PROOF OF SERVICE

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

Coastal Corporation Ltd. v. Harvest King Trading USA, Limited, et al., Case No. 2:22-cv-02687-DSF-JEM

I am employed in the County of Los Angeles, State of California. I am over the age of eighteen (18) and not a party to the within action. My business address is 280 South Beverly Drive, Suite 504, Beverly Hills, California 90212. On **February 22, 2023**, I served the forgoing document(s), described as **DECLARATION OF ALBERTO J. CAMPAIN RE COMPLIANCE WITH ORDER CONDITIONALLY GRANTING MOTION TO WITHDRAW AS COUNSEL OF RECORD (DKT. 24)** on all interested parties to this action, as follows:

- BY MAIL:** By placing the original a true and correct copy of said document(s) in a sealed envelope(s) addressed as set forth on the service list herein, sealing it, and placing it for collection and mailing following ordinary business practices. I am readily familiar with the business' practice of collection and processing correspondence for mailing with the United States Postal Service (USPS). Under that practice, it would be deposited with the USPS in Beverly Hills, California, on that same day with postage thereon fully prepaid in the ordinary course of business. I am aware that on motion of party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit.
- BY OVERNIGHT MAIL:** By placing a true and correct copy of said document(s) in an envelope(s) designated by an express service carrier for overnight delivery, with delivery fees and postage prepaid, addressed as set forth on the service list herein, sealing it, and causing it to be deposited on that same day in a box or other facility regularly maintained by the carrier.
- BY PERSONAL SERVICE:** By placing a true and correct copy of said document(s) in an envelope(s) addressed as set forth on the service list herein, sealing it, and delivering by hand to the addressee(s).
- BY EMAIL:** Under statute, rule or court order, or by agreement, by emailing said document(s) to the person(s) as set forth on the service list herein.
- BY FACSIMILE:** Under statute, rule or court order, or by agreement, by faxing said document(s) to the person(s) as set forth on the service list herein.
- BY NOTICE OF ELECTRONIC FILING (“NEF”):** Pursuant to controlling General Order(s) said document(s) will be served by the Court via NEF and hyperlink to the document(s) or by electronically filing the document(s) on the Court’s ECF system.
- STATE:** I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.
- FEDERAL:** I declare under penalty of perjury under the laws of the UNITED STATES OF AMERICA that the foregoing is true and correct.

SERVICE LIST:

Thomas Jau
725 W. Duarte Road, #1581
Arcadia, CA 91007

Harvest King Trading USA, Limited
Attn: Thomas Jau
725 W. Duarte Road, #1581
Arcadia, CA 91007

Pak Lam
725 W. Duarte Road, #1581
Arcadia, CA 91007

/s/ Stacy Aguero
Stacy Aguero

Dated: February 22, 2023

